

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RICHARD W. DUGGAN,
Plaintiff,

v.

JOHN POTTER, POSTMASTER
GENERAL, ET AL,
Defendants.

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) Civil Action No. 04-11116-DPW
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JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1

Pursuant to Local Rule 16.1, the parties propose the following Discovery Plan and Motion Schedule for the Court to consider in connection with the initial scheduling conference in this matter currently scheduled for Thursday, February 10, 2005, at 2:30 pm, before Judge Douglas P. Woodlock.

Proposed Schedule

Event

Deadline

Completion of Written Fact Discovery
and Depositions

May 31, 2005

Deadline for Filing Dispositive Motions

July 31, 2005

Final Pretrial Conference

To be scheduled by
the Court

Trial

To be scheduled by
the Court

Certification

Counsel for the defendants will file the certification Local Rule 16.1 requires certifying that he has spoken with his client concerning a litigation budget and alternative dispute resolution programs on or before the initial scheduling conference.

Conference

Pursuant to Local Rule 16.1(B) and Fed.R.Civ.P. 26(f), counsel for the parties have conferred.

For the pro se plaintiff,



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For the defendants,
MICHAEL J. SULLIVAN
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Dated: February 2, 2005